

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MIDDLESEX, SS.

Docket No: 05MC10308

NATIONAL STABILIZATION AGENT,
Of SHEET METAL INDUSTRY,
TRUST FUND, et al

Plaintiffs

v.

E. A. BREEN JR., ROOFING & SHEET
METAL WORK, INC.

Defendants

and

WINTER HILL BANK,

Trustee

ANSWER OF TRUSTEE

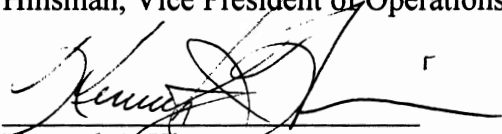
Now comes Winter Hill Bank, the above named Trustee and hereby answers the Summons to Trustee served on December 6, 2005, as follows:

1. Winter Hill Bank is a trade name for Winter Hill Federal Savings Bank.
2. The Trustee states that on the date of service, it had the following accounts registered in the name of the Defendant, E.A. Breen, Jr., Roofing & Sheet Metal Works, Inc.:

Account Number 214011454 containing funds with a value in excess of the judgment amount
3. The Trustee further states that sufficient assets in account 214011454 have been restricted and made inaccessible to the defendant pending further certified Order of the Court.
4. The Trustee leaves it to litigation between the parties to determine whether such assets are "goods, effects or credits" of the defendant, but the Trustee will deem such funds to be "goods, effects or credits" until a court determines otherwise.

Please deliver all further communications to Ronald A. Dardeno, counsel to the Trustee.

Signed under the penalties of perjury to the best of my knowledge and belief, by Kenneth J. Hinsman, Vice President of Operations on this 12th day of December 2005.

A handwritten signature in black ink, appearing to read "Kenneth J. Hinsman", written over a horizontal line.

Kenneth J. Hinsman
Vice President of Operations
342 Broadway
Somerville, MA 02145

CERTIFICATE OF SERVICE

I, Ronald A. Dardeno, Esquire do herewith certify that I have this 13th day of December, 2005, served, via First Class Mail, a true and Photostat copy of the following document:


ANSWER OF TRUSTEE

Upon counsel to Plaintiff:

RANDALL E. NASH
11 Beacon Street
Boston, Massachusetts 02108

and

E. A. Breen, Jr., Roofing & Sheet Metal Work, Inc.
Ernest A. Breen, Jr.
464 Main Street
Medford, MA 02155



RONALD A. DARDENO, ESQUIRE
LAW OFFICES OF FRANK N. DARDENO, LLP
424 Broadway
Somerville, MA 02145
Tel: 617-666-2600
BBO# 548278